

EXHIBIT O

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MASSACHUSETTS

3
4 In Re: PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE

5 PRICE LITIGATION

6 -----
7 IN THE DISTRICT COURT OF

8 TRAVIS COUNTY, TEXAS Case No.

9 Cause No. GV401286 MDL No. 1456

10 THE STATE OF TEXAS Ex rel. Civil Action No.

11 VEN-A-CARE OF THE FLORIDA KEYS, INC., 01-12257-PBS

12 Plaintiffs

13 v.

14 ABBOTT LABORATORIES, INC., et al.,

15 Defendants. Volume II

16 -----
17 CONTINUED VIDEOTAPE DEPOSITION OF ZACHARY TAYLOR

18 BENTLEY II, Thursday, March 6, 2008

19 9:05 a.m. - 12:25 p.m. 1:20 p.m. - to 5:25 p.m.

20 21st Floor 2 South Biscayne Boulevard Miami, Florida 33131

21 by: Sherilynn McKay, RMR, CRR Notary Public,

22 State of Florida

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3 Civil Action No. 03-cv-11865-PBS
4

5 THE COMMONWEALTH OF MASSACHUSETTS,
6 Plaintiff,
7 - against -
8 MYLAN LABORATOIRES, INC., et al.
9 Defendants.

10 -----
11 IN THE DISTRICT COURT OF THE FOURTH
12 JUDICIAL DISTRICT OF THE STATE OF IDAHO IN
13 AND FOR THE COUNTY OF ADA
14

15 Case No. CV OC 0701847
16 STATE OF IDAHO,
17 Plaintiff
18 vs.
19 ALPHARMA USPD INC., et al.,
20 Defendants.
21
22 -----

1 COMMONWEALTH OF KENTUCKY FRANKLIN CIRCUIT COURT

2 DIV 1 CIVIL ACTION NO. 04-CI-1487

3 COMMONWEALTH OF KENTUCKY Ex rel,

4 JACK CONWAY ATTORNEY GENERAL

5 Plaintiff,

6 v.

7 ALPHARMA USPD, INC., et al.

8 Defendants.

9 -----
10 COMMONWEALTH OF KENTUCKY FRANKLIN CIRCUIT COURT

11 FRANKLIN CIRCUIT COURT - DIV III

12
13 CIVIL ACTION NO.

14 COMMONWEALTH OF KENTUCKY,

03-CI-1134

15 Plaintiff

16 vs.

17 ABBOTT LABORATORIES, INC.,

18 Defendant.

19 IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, DOCKET NO.

20 ALABAMA MASTER

CV-2005-219

21 In the Matter of ALABAMA MEDICAID PHARMACEUTICAL

22 AVERAGE WHOLESALE PRICE LITIGATION

1 A Yes.

2 Q And that encloses a number of letters from
3 you to the heads of the Medicaid programs of the
4 various states. Correct?

5 A Yes, sir.

6 Q And those letters are dated October 24,
7 1994?

8 A Correct.

9 Q Am I correct in assuming that it's these
10 October 24, 1994 letters to the directors of
11 Medicaid that you're referring to in your letter to
12 Mr. Wells on October 31, 1994, one week later?

13 A Oh. Yes.

14 Q And, in fact, you carbon copy Mr. Wells on
15 the bottom of each of the letters to the various
16 state Medicaid agencies. Correct?

17 A Correct.

18 Q In this letter, you indicate to each of the
19 Medicaid program heads that you are working on a
20 continuing educational project concerning our
21 nation's Medicaid reimbursement of the above-
22 referenced drugs.

1 Did I read that correctly?

2 A Yes, sir.

3 Q Were you working on a continuing
4 educational project?

5 A It was to me.

6 Q Were you in school?

7 A I don't think you have to be in school to
8 have -- to do continuing education.

9 Q In fact, your continuing education project
10 was Ven-A-Care's investigation. Correct?

11 A Well, it was also educating of me. I
12 certainly considered it to be educational. I knew
13 nothing about the pharmaceutical business and it was
14 all a learning experience.

15 Q Is it your testimony that this letter
16 fairly and honestly conveys to the head of the
17 Medicaid programs the reason that you're asking the
18 questions that you do?

19 A It certainly reflects one of the reasons.
20 I didn't put all of the reasons down. That was my
21 main reason right there.

22 Q You didn't advise these Medicaid programs